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Subject: the BDCP inserts
[DRAFT EPA ADMIN DRAFT P & N Commentscyale.docx](#)

Maybe a bit longwinded per topic, but limited in number.

And a couple of asides:

1. Tom, I promised the water supply reliability cite from the Delta Plan V 5 (most recent) (Stewardship Council). This is on page 5:

Despite the cheerful optimism of past governance efforts to assert that when it comes to matter of the Delta "we can all get better together," the Council has reached another conclusion. True effort to achieve the coequal goals will in fact bring tradeoffs that will be neither popular nor clear-cut. ...

Water supply reliability means the expansion and more efficient management of California's water resources so that the Californians can more predictably match their water use to the amount of water available.

The reliability of water exports from the Delta watershed should not be assessed based on current contract amounts. Instead, reliability should be a range of expected diversion amounts based upon annual precipitation and dictated by the ecosystem's safe yield, as determined by science and by our infrastructure's capacity to manage wet year and dry year flows.

I just returned today from a State Water Plan workshop that is digging deep into issues of sustainability and reliability that acknowledges limitations of natural systems to 'supply' our use. This 'softer path' version of reliability has been a principle of the Water Plan since the 2005 'edition.'

2. Additional observation re BDCP chapters. (This may not be needed-- ie, if we like the model runs)

CH 2 2.1 treats what we would call environmental objectives and requirements as 'constraints' on water operations. This is technically accurate, in that the project operations objective functions are 'export' subject to 'constraints.' This is hardly in the spirit of co-equal goals. We've talked about change the objective function with flows recommendations.

Check the alternatives for a range of flow values (inflow, outflow, constrained exports) consistent with envir objectives.

DWR may resist on grounds that flows are speculative (in which case, maybe do good future cumulative?) or that not part of proposed action / beyond leads' jurisdiction. To my knowledge, there's no NEPA ban on including in an alternative, an action outside the jurisdiction of the lead agencies/agency.

I raise this point because the short mention of State Board flows studies is grudging at best.

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